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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

ANDREW J. KORNECKI, Individually)	No. 2:20-cv-10084-KM-JBC
and on Behalf of All Others Similarly)	
Situated,)	<u>CLASS ACTION</u>
Plaintiff,)	STIPULATION AND ORDER
vs.)	SETTING SCHEDULE
AIRBUS SE, et al.,)	
Defendants.)	
_____)	

Lead Plaintiff Operating Engineers Construction Industry and Miscellaneous Pension Fund (“Pension Fund,” “Plaintiff,” or “Lead Plaintiff”) and Defendants Airbus SE (“Airbus SE”), Guillaume M.J.D. Faury, Tom Enders, Dominik Asam, and Harald Wilhelm (“Defendants” and together with Lead Plaintiff, the “Parties”) by and through their undersigned counsel, agree and jointly propose this stipulation:

WHEREAS, on August 6, 2020, Andrew J. Kornecki filed the initial complaint (“Complaint”) in this action on behalf of persons or entities who purchased or otherwise acquired Airbus SE securities in the United States between February 24, 2016, and July 30, 2020 (“Class”);

WHEREAS, Pension Fund was appointed Lead Plaintiff by the Court pursuant to the Private Securities Litigation Reform Act of 1995 to represent the Class;

WHEREAS, all Defendants have either been served with the Complaint or have agreed to accept or otherwise waive service of the Complaint;

WHEREAS, the Court has extended the date by which all Defendants are required to answer, move, or otherwise respond to the Complaint; and

WHEREAS, the amended complaint is currently due on March 8, 2022; and

WHEREAS, the Parties stipulate and agree that Defendants’ time to answer, move, or otherwise respond to the Complaint should be held in abeyance until Lead Plaintiff has filed its amended complaint.

IT IS HEREBY STIPULATED AND AGREED as follows:

1. Lead Plaintiff will file and serve a consolidated and/or amended complaint (“Consolidated Complaint”) no later than April 1, 2022;
2. Defendants will have 60 days following the filing of the Consolidated Complaint to serve and file with the Court their responsive pleading;
3. In the event that Defendants’ responsive pleading is a motion to dismiss the Consolidated Complaint, Lead Plaintiff will have 60 days to serve and file with the Court an opposition to Defendants’ motion to dismiss the Consolidated Complaint;
4. Defendants will thereafter have 45 days to serve and file with the Court a reply to Lead Plaintiff’s opposition to Defendants’ motion to dismiss the Consolidated Complaint; and
5. Nothing above waives or modifies any rights, defenses, or positions of any party.

DATED: March 7, 2022

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/s/ James E. Cecchi

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Lead Counsel for Lead Plaintiff

DATED: March 7, 2022

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DATED: March 7, 2022

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IT IS SO ORDERED.

DATED: March 8, 2022

/s/ Kevin McNulty

THE HONORABLE KEVIN McNULTY
UNITED STATES DISTRICT JUDGE